

**To:** Amato, Paul[Amato.Paul@epa.gov]  
**From:** Albright, David  
**Sent:** Tue 7/19/2016 6:36:50 PM  
**Subject:** RE: AE application projections

Hi Paul,

We are expecting as many as 20-25 AE requests from the state for action by Feb 2017. Why the decrease from 50? Some requests are going to be on a slower timetable, some have been consolidated (e.g., 3 packages are combined into 1), and some requests are not materializing because either the operator is not proposing to move forward with a request or the state is not passing the request along (e.g., it does not meet the exemption criteria). The other points you included sound good.

Let me know if you have other questions about this.

Thanks,

David

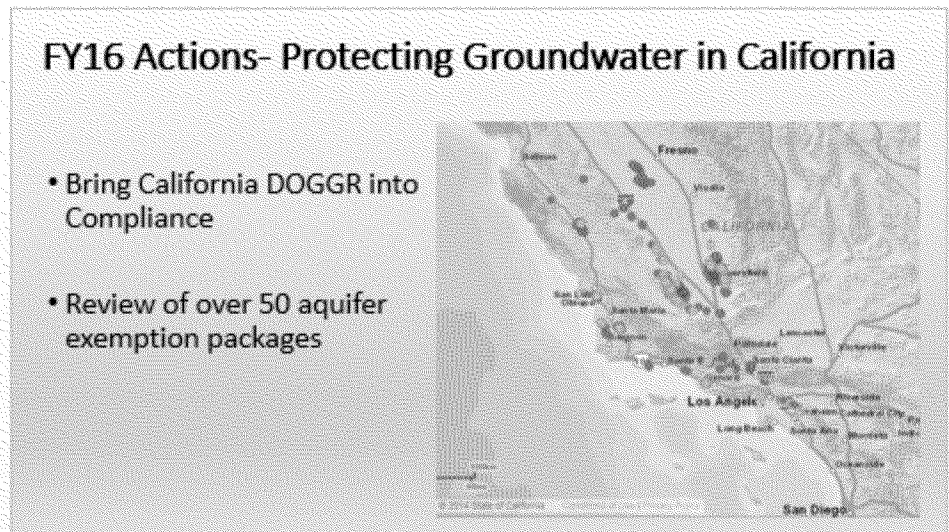
**From:** Amato, Paul  
**Sent:** Wednesday, July 13, 2016 1:42 PM  
**To:** Albright, David <Albright.David@epa.gov>  
**Subject:** AE application projections

Hi David,

I'm updating a presentation that Tomás originally gave the SMT back in January on FY16 priorities. Now he will report out on FY16 outcomes at the 8/15 meeting. In the slide below, we mentioned anticipating more than 50 AE packages. Why has that gone down to 15-20 as has come up in recent discussions?

So you know, I intend to include bullets on the recent info sessions in Bakersfield, the upcoming August 15 deadline for submission to the State, and the October 15 deadline for the State to

submit to us for approval. I can also include development of our checklist for state-submitted AE packages, review/send back of Arroyo Grande, and review/comments on CA's revised UIC regs. Please let me know if that sounds right and if there are other important related outcomes to include.



(Map from DOGGR showing EPA Wells for Aquifer Exemption Review)

- The California Division of Gas and Geothermal Resources (DOGGR) oversees the drilling, operation, maintenance, and abandonment of gas and geothermal wells.
- EPA found that the State had inappropriately issued permits in violation of the SDWA.
- In order to come into compliance the state must submit Industry AE for approval by EPA, which must be approved. If not approved, wells will need to be shut in = 15 – 20% of oil production in CA stopping.
- We anticipate having to review more than 50 aquifer exemption packages for thousands of Class II disposal wells for oil.

Paul F. Amato

Water Division,

Management & Program Analyst/Communications Liaison

U.S. EPA, Region 9

75 Hawthorne Street, WTR-1

San Francisco, CA 94105-3901

t:(415) 972-3847

f:(415) 947-8026

e:amato.paul@epa.gov